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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

WELLS FARGO BANK, N.A. SUCCESSOR  
BY MERGER TO WELLS FARGO BANK  
MINNESOTA, N.A., F/K/A NORWEST  
BANK MINNESOTA, N.A. SOLELY A  
TRUSTEE FOR STRUCTURED ASSET  
MORTGAGE INVESTMENT II INC. BEAR  
STEARNS MORTGAGE FUNDING TRUST  
2007-AR1, MORTGAGE PASS-THROUGH  
CERTIFICATES, SERIES 2007-AR1,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,  
INC., et al.,

Defendants.

Case No.: 2:20-cv-02155-RFB-BNW

**STIPULATION AND PROPOSED  
ORDER EXTENDING DEFENDANT  
FIDELITY NATIONAL TITLE  
INSURANCE COMPANY'S TIME TO  
RESPOND TO MOTION FOR  
REMAND AND MOTION FOR FEES  
AND COSTS**

**(First Request)**

Defendant Fidelity National Title Insurance Company (“Fidelity”) and Plaintiff Wells Fargo Bank, N.A. Successor by Merger to Wells Fargo Bank of Minnesota, N.A., f/k/a Norwest Bank Minnesota, N.A. solely as Trustee for Structured Asset Mortgage Investments II Inc. Bear Stearns Mortgage Funding Trust 2007-AR1, Mortgage Pass-Through Certificates, Series 2007-AR1’s (“Wells Fargo”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On November 23, 2020, Wells Fargo filed its Complaint in the Eighth Judicial District Court, Case No. A-20-825298-C [ECF No. 1-1];
2. On November 23, 2020, Fidelity filed a Petition for Removal to this Court [ECF No. 1];
3. On December 3, 2020, Wells Fargo filed a Motion for Remand [ECF Nos. 8];
4. On December 3, 2020, Wells Fargo filed a Motion for Costs and Fees [ECF Nos. 9];
5. Fidelity’s deadline to respond to Wells Fargo’s Motion for Remand and Motion for Costs and Fees is currently December 17, 2020;
6. Fidelity’s counsel is requesting an extension until Thursday, December 31, 2020, to file its response to the pending Motion for Remand and Motion for Costs and Fees;
7. Fidelity requests a brief extension of time to respond to the Motion for Remand and Motion for Costs and Fees to afford Fidelity additional time to respond to the legal arguments set forth in Wells Fargo’s motions;
8. Wells Fargo does not oppose the requested extension;
9. This is the first request for an extension which is made in good faith and not for purposes of delay;

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1           **IT IS SO STIPULATED** that Fidelity's deadline to respond to Wells Fargo's Motion for  
2 Remand [ECF No. 8] and Motion for Costs and Fees [ECF No. 9] is hereby extended through and  
3 including December 31, 2020.

4  
5 Dated: December 16, 2020

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

6  
7 By: /s/-- Sophia S. Lau  
SCOTT E. GIZER  
SOPHIA S. LAU  
Attorneys for Defendant FIDELITY  
8 NATIONAL TITLE INSURANCE  
9 COMPANY

10  
11 Dated: December 16, 2020

SINCLAIR BRAUN LLP

12 By: /s/-Kevin S. Sinclair  
KEVIN S. SINCLAIR  
Attorneys for Defendant FIDELITY  
13 NATIONAL TITLE INSURANCE  
14 COMPANY

15 Dated: December 16, 2020

WRIGHT FINLAY & ZAK, LLP

16 By: /s/-Darren T. Brenner  
DARREN T. BRENNER  
Attorneys for Plaintiff WELLS FARGO  
17 BANK, N.A.  
18

19 **IT IS SO ORDERED:**

20  
21 Dated: December 28, 2020.

22   
**RICHARD E. BOULWARE, II**  
**United States District Court**

**CERTIFICATE OF SERVICE**

I hereby certify that on December 16, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN  
An Employee of EARLY SULLIVAN  
WRIGHT GIZER & McRAE LLP

